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**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

Jessica Kahraman, et al.,
Plaintiffs,
v.
State of Arizona, et al.,
Defendant

Case No.: CV-22-00375-PHX-SRB

NOTICE OF ERRATA

(Hon. Susan R. Bolton)

Plaintiffs, by and through undersigned counsel, hereby file this Notice of Errata, advising the Court and State Defendants that *Plaintiff's Controverting Statement of Facts in Support of Response in Opposition to Defendant's Motion for Summary Judgment* [Doc. 32] ("CSOF") contains inadvertent errors, as summarized here and further explained in the Declaration of Natalie Newell, attached hereto as **Exhibit 1**. As Ms. Newell explains, the original CSOF ¶ 81 was inadvertently deleted in the editing process, using WORD, thereby causing the subsequent CSOF paragraph numbering to be automatically adjusted by one, such that original CSOF ¶ 82 became CSOF ¶ 81; original CSOF ¶ 83 became CSOF ¶ 82, and so on through original CSOF ¶ 89 becoming CSOF ¶ 88 and original CSOF

¶ 90 becoming CSOF ¶ 89. Although original CSOF ¶¶ 90 – 103 were also automatically adjusted by one, that adjustment does not affect the citations in Plaintiffs' Response [Doc. 229].

To remedy these inadvertent events, the following errata changes are hereby supplied, and are reflected on a redlined document to clearly show the errata, attached here as **Exhibit 2**:

- The original CSOF ¶ 81, which was inadvertently deleted, is reinserted as CSOF ¶ 81 as follows: "81. Not Disputed."
- CSOF ¶¶ 81 – 88 are renumbered such that:
 - CSOF ¶ 81 [Doc. 232 at 8:11] is renumbered to CSOF ¶ 82;
 - CSOF ¶ 82 [Doc. 232 at 8:15] is renumbered to CSOF ¶ 83;
 - CSOF ¶ 83 [Doc. 232 at 8:16] is renumbered to CSOF ¶ 84;
 - CSOF ¶ 84 [Doc. 232 at 8:18] is renumbered to CSOF ¶ 85;
 - CSOF ¶ 85 [Doc. 232 at 8:20] is renumbered to CSOF ¶ 86;
 - CSOF ¶ 86 [Doc. 232 at 8:21] is renumbered to CSOF ¶ 87;
 - CSOF ¶ 87 [Doc. 232 at 8:23] is renumbered to CSOF ¶ 88;
 - CSOF ¶ 88 [Doc. 232 at 8:25] is renumbered to CSOF ¶ 89; and
 - CSOF ¶ 89 [Doc. 232 at 9:3] is renumbered to CSOF ¶ 89-Renum.

Because the CSOF citations in Plaintiffs' Response [Doc. 229] were inserted after the inadvertent editing snafu, the citations to CSOF ¶¶ 81 – 89 in the Response [Doc. 229] must also be corrected. Those corrections to Doc. 229 are as follows (by line:page):

- Doc. 229 at 5:14 – Replace "89" with "89-Renum"
- Doc. 229 at 8:1 – Replace "81" with "82"
- Doc. 229 at 8:19 – Replace "81" with "82"
- Doc. 229 at 15:9 – Replace "81" with "82"
- Doc. 229 at 15:17 – Replace "81" with "82"
- Doc. 229 at 21:14 – Replace "89" with "89-Renum".

1 Plaintiffs have acted promptly in submitting these errata as they only became aware
2 of these inadvertent errors this same day at oral arguments on State Defendants' motion for
3 summary judgment when defense counsel, by referring to CSOF ¶ 82 as filed at Doc. 232,
4 argued to the Court that Plaintiffs had admitted SSOF ¶ 82, a purported statement of fact
5 which any reasonable counsel would have recognized as contrary to the claims asserted in
6 the Complaint and in direct opposition to Plaintiffs' arguments throughout their Response,
7 at oral arguments, and in responses to similar purported statements of fact by State
8 Defendants.

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10 **RESPECTFULLY SUBMITTED** this 3rd day of April 2025.

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12 **MILLS & WOODS LAW PLLC**

13 By /s/ Thomas A. Connelly
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CERTIFICATE OF SERVICE

I hereby certify that on April 3, 2025, I electronically transmitted the foregoing document to be filed electronically with the Clerk's Office through the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to be served on all counsel of record via the Court's CM/ECF system.

/s/ Thomas A. Connelly

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